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14 *Attorneys for Defendants*, BIOMET, INC.,
BIOMET ORTHOPEDICS, LLC, F/K/A
15 BIOMET ORTHOPEDICS, INC., DJO
GLOBAL, INC.; and ENCORE MEDICAL,
16 L.P. D/B/A DJO SURGICAL

17 UNITED STATES DISTRICT COURT
18 DISTRICT OF NEVADA, NORTHERN DIVISION
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20 DEBRA GREGOIRE,
21 Plaintiffs,
22 vs.
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24 BIOMET, INC., BIOMET ORTHOPEDICS,
LLC, F/K/A BIOMET ORTHOPEDICS,
INC., DJO GLOBAL, INC.; and ENCORE
25 MEDICAL, L.P. D/B/A DJO SURGICAL,
and DOES 1 500,
26

27 Defendants.

CASE NO. 3:20-cv-00077-MMD-CLB

STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE A
RESPONSE TO PLAINTIFF'S FIRST
AMENDED COMPLAINT

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1 The parties, by and through their undersigned counsel of record, hereby stipulate
2 and agree that the time for Defendants BIOMET, INC., BIOMET ORTHOPEDICS, LLC,
3 F/K/A BIOMET ORTHOPEDICS, INC., DJO GLOBAL, INC. and ENCORE MEDICAL,
4 L.P. D/B/A DJO SURGICAL to file their response to Plaintiffs' Amended Complaint, be
5 extended until May 29, 2020.

6 Reason for Extension

7 Because of the limitations and challenges presented by CV-19 and the complexity
8 and extent of the allegations and claims made in Plaintiffs' Amended Complaint,
9 Defendants BIOMET, INC., BIOMET ORTHOPEDICS, LLC, F/K/A BIOMET
10 ORTHOPEDICS, INC., DJO GLOBAL, INC.; and ENCORE MEDICAL, L.P. D/B/A DJO
11 SURGICAL require additional time to perform an investigation prior to filing their
12 responsive pleading and to respond accordingly. This stipulation is made in good faith
13 and not for the purpose of delay.

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1 This is the first extension of time requested by counsel for filing Defendants
2 response to Plaintiffs' Amended Complaint.

3 DATED this 27th day of May, 2020.

DATED this 27th day of May, 2020.

4 LEWIS BRISBOIS BISGAARD & SMITH

HUTCHISON & STEFFEN, PLLC.

5 /s/ Darell D. Dennis

/s/ Devon T. Reese

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16 LLC, F/K/A BIOMET ORTHOPEDICS,
17 INC., DJO GLOBAL, INC.; and ENCORE
MEDICAL, L.P. D/B/A DJO SURGICAL

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ORDER

IT IS SO ORDERED.

Dated this 27th day of May 2020.

A handwritten signature in blue ink, appearing to read 'Miranda M. Du', is written over a horizontal line.

MIRANDA M. DU
U.S. DISTRICT COURT JUDGE